

Florida Department of Agriculture & Consumer Services

FEB 2.5 1993

FEDERAL COMPUNICATIONS COMMISSION

OFFICE OF THE SECRETARY
PLEASE RESPOND TO: Division of Forestry

3125 Conner Boulevard Tallahassee, FL 32399-1650

The Capitol Tallahassee 32399-0810

ES COMMUNICATIONS Radio/FCC

RECEIVED

February 15, 1993

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FCC MAIL ROOM

FREOUENCY

Donna R. Searcy, Secretary Federal Communications Commission Washington, DC 20554

STATEMENT OF OPPOSITION TO PR DOCKET #92-235,

REFARMING PROCEDURE

Dear Ms. Searcy:

This letter is to express opposition by the Florida Division of Forestry to the Notice of Proposed Rule Making (NPRM) of PR Docket #92-235. The primary reason for our opposition is the fact that most - if not all - of our radio equipment will be rendered obsolete when the full proposal is implemented. Additionally, we expect to have to install several additional base stations and relocate many others to compensate for the reduced radiated power as proposed. Furthermore, we feel that, as a public safety agency, we are losing what little advantage we hold in the frequency coordination process to commercial radio concerns.

All of the above factors working together will overwhelm our radio system. Our equipment will be rendered obsolete. The cost for new equipment will be absolutely enormous - several million dollars - simply to retain the capability that we enjoy today.

Our radios are essential to the accomplishment of our Public Safety mission of wildfire suppression and other Forestry Conservation activities. Given the tight budgetary constraints that we have endured for the last several years and that are anticipated in the foreseeable future, we are not at all sure money will be available to convert our system.

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We are only one agency that will be affected by the proposed ruling. The cost that will be required for all radio users, public and private, in the United States to comply are just totally unimaginable.

Your intentions may be admirable, but the benefits to be derived in no way warrant such awesome expenditures by the American people. We strongly encourage you to reconsider such sweeping changes to the radio community.

Five copies of this statement of opposition are enclosed.

Sincerely,

BOB CRAWFORD,

COMMISSIONER OF AGRICULTURE

L. Earl Peterson, Director Division of Forestry

(904) 488-4274

LEP/mf

Enclosures